

From: [Linda Causey](#)
To: [P65Public Comments](#)
Subject: Glyphosate NSRL
Date: Tuesday, June 20, 2017 3:32:08 PM

Dear Ms. Esther Barajas-Ochoa,

Please accept the following comments on the proposed NSRL for Glyphosate:

A. The IARC Monograph “Some Organophosphate Insecticides and Herbicides, Volume 112” overall evaluation stated that “There is strong evidence that exposure to glyphosate or glyphosate-based formulations is genotoxic...” (page 398). The Monograph did not present any studies to determine if that chromosomal damage propagated to the next generation. Would you please determine if glyphosate is teratogenic using animal studies before approving a NSRL for glyphosate?

B. The IARC Monograph “Some Organophosphate Insecticides and Herbicides, Volume 112” evaluation (page 78) stated: “A positive association has been observed for non-Hodgkin lymphoma.” Would you please conduct further studies regarding the positive association between glyphosate and non-Hodgkin lymphoma in order to definitely determine if this association is significant?

C. Would you kindly address the concerns brought up in the following EcoWatch article by Zen Honeycutt, “Monsanto’s Glyphosate Found in California Wines, Even Wines made with Organic Grapes”? Specifically:

1. Glyphosate appears to be ubiquitous. Have these numerous sources been included in the exposure assessment?
2. Investigate the claim that grape wines are only lasting 10-20 years as opposed to 100 years due to the properties of glyphosate and determine if glyphosate has the same deleterious effect on other plants.
3. Investigate the 10 to 20% higher than national average rates for breast cancer for Sonoma, Napa, and Mendocino Counties and determine the validity of the statement. If the increased breast cancer rates can be traced to the exposure of Glyphosate, present why that would be acceptable for approving a NSRL for glyphosate.
4. Investigate the validity of the pig study that found a 30% increase of birth defects and stillborn with the introduction of glyphosate-sprayed grains. Determine if there is causation (as intimated in the article below) between glyphosate- sprayed grains and the infertility and sterility in America.
5. Verify Gilles-Eric Seralini’s assertion that the co-formulants of Roundup are 1,000 times more toxic than glyphosate. Determine the human health risk of those co-formulants.

Monsanto's Glyphosate Found in California Wines, Even Wines Made With Organic Grapes

By Zen Honeycutt

Shortly after the release of a report showing 14 beers [testing positive](#) for [glyphosate](#) in Germany, a concerned supporter of [Moms Across America](#) approached me at a convention

with disturbing news. He said he had test **results** from Microbe Inotech Lab of St.Louis showing 10 different wines, from large and small vineyards, contained the chemical glyphosate, the active ingredient in Monsanto's **Roundup** weedkiller, including wine made with organic grapes.



Test results from Microbe Inotech Lab show 10 different wines contained glyphosate, the active ingredient in Monsanto's Roundup weedkiller, including wine made with organic grapes.

The contamination of conventional wine was 28 times higher than organic wine, with levels ranging from 0.659 ppb in organic to 18.74 ppb in conventional wine.

The wines tested came from Napa Valley, Sonoma and Mendocino counties in California. The brand names of the wines were not revealed, and frankly, the brands are not the issue. The real issue is the widespread contamination of glyphosate based herbicides in consumer products.

Glyphosate in wine test results from Microbe Inotech Lab, St.Louis Missouri

Results:

Sample Name	Dilution	Results in ppb	Final Results:
Sample #1	No Dilution	0.913	0.913 ppb
Sample #2	No Dilution	Above detection range	--
	1:10	0.251	2.51 ppb
Sample #3	No Dilution	1.064	1.064 ppb

<0.075 ppb ND = result is below range of detection.

Disclaimer: the MiL, inc. is not a human clinical diagnostic laboratory and makes no warranty to the fitness of this data for such purposes.

Results:

Sample Name	Dilution	Results in ppb	Final Results:
Sample #1	No Dilution	Above detection range	--
	1:10	0.830	8.30ppb
Sample #3	No Dilution	Above detection range	--
	1:10	1.874	18.74ppb
Sample #4	No Dilution	2.656	2.656ppb
Sample #5	No Dilution	0.659	0.659ppb
Sample #7	No Dilution	2.797	2.797ppb
Sample #8	No Dilution	1.604	1.604ppb
Sample #9	No Dilution	Above detection range	--
	1:10	0.428	4.28ppb

<0.075 ppb ND = result is below range of detection.

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All wines are from the North Coast region of California, the premium wine growing region of California and includes wines from Napa, Sonoma and Mendocino counties. The wines were sent in Sept of 2015 and February of 2016 in two separate groups.

Here are my five reasons why Roundup/glyphosate should never be sprayed on any crops, including vineyards:

1. According to farmers like John Kempf of AdvancingEcoAg.com, glyphosate based herbicides are showing up in irrigation water, are likely present in manure/fertilizer from

animals fed **genetically modified** grains and drift from spraying. Glyphosate residues have been detected in many **foods**, cotton products, breast milk, beers and wines.

2. Wine growers of conventional farms report that their family businesses use to be able to harvest from their vines for 100 years. Today, with chemical farming, vines are lasting 10-12 years. Glyphosate is a chelator, which makes the vital nutrients and minerals of any living thing it touches unavailable. Taking the risk of depleting the vitality of important crops is not a good long term decision for farmers of any kind. Instead, **Regenerative agriculture** enriches the soil, supports longevity of the farm and does not use toxic chemicals.

3. Glyphosate has been deemed a probable carcinogen by the World Health Organization. Even the small amount of 0.1ppt of glyphosate has been shown to stimulate the **growth of breast cancer cells**. According to the California Department of Health, breast cancer rates in the Sonoma, Napa and Mendocino counties are 10 to 20 percent higher than the national average. There are **many pending lawsuits** against Monsanto for the connection between non-Hodgkin's lymphoma and Roundup.

4. The pig study by Pedersen and Krueger showed a repeated 30 percent increase of birth defects and stillborn with the introduction of glyphosate-sprayed grains. The infertility and sterility in America is exactly correlated to the pig study results, at 30 percent, the highest in recorded U.S. history.

5. French scientist Gilles-Éric Seralini and his team have discovered that the co-formulants of Roundup are **1,000 times more toxic** than glyphosate and are **hormone disruptors**, which can lead to breast **cancer**, miscarriages, birth defects and many other health issues.

D. Finally, would you please make a determination on the economic cost to finding glyphosate in California wines? I know that I no longer drink California wines. Is there currently, or the probability in the future of a significant loss of revenue, jobs, or taxes?

Thank you kindly,